

FILED



UNITED STATES DISTRICT COURT

for the
District of New MexicoIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

)

Case No. 23mr412

INFORMATION ASSOCIATED WITH FETLIFE
USERNAME GADMANJ40 THAT IS STORED AT
PREMISES CONTROLLED BY BITLOVE

)

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A, attached hereto and incorporated herein by reference.

located in the _____ District of New Mexico, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, attached hereto and incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 USC § 2422(b)	Attempted coercion and enticement

The application is based on these facts:

See attached affidavit, incorporated herein by reference.

Continued on the attached sheet.

Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Nancy Stemo, FBI Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
Telephonically Sworn and Electronically Signed (specify reliable electronic means).

Date: 2/22/2023

City and state: Albuquerque, New Mexico

Steven C. Yarbrough, United States Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

IN THE MATTER OF THE SEARCH OF:

INFORMATION ASSOCIATED WITH
FETLIFE USERNAME GADMANJ40
THAT IS STORED AT PREMISES
CONTROLLED BY BITLOVE

Case No. _____

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Nancy Stemo, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with certain accounts that are stored at premises owned, maintained, controlled, or operated by BitLove, Inc. (“BitLove”), an electronic communications service and/or remote computing service provider headquartered at 718-333 Brooksbank Avenue, Suite #125, North Vancouver, British Columbia. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A) to require BitLove to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since May 2016. I am currently assigned to the FBI’s Child Exploitation and Human Trafficking Task Force where I investigate a myriad of federal violations including: violent crimes

against children, human trafficking, child pornography, online enticement, and sexual exploitation of children. I have received on the job training from other agents in the investigation of federal offenses, to include the possession, distribution, and production of child pornography. My investigative training and experience includes, but is not limited to, conducting surveillance; interviewing subjects, victims, and witnesses; writing affidavits for search warrants and criminal complaints; collecting evidence; and learning legal matters which includes the topics of fourth amendment searches. I have attended trainings specific to online child exploitation and human trafficking. I have previously participated in numerous child exploitation investigations and search warrants. I also have received training and have experience in obtaining, receiving, and reviewing electronic records.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that a violation of 18 U.S.C. § 2422(b), attempted coercion and enticement of a minor, has been committed by username “Gadmanj40,” believed to be utilized by Joseph Gadman (“GADMAN”) (YOB 1982). There is also probable cause to search the information described in Attachment A for evidence of this crime, as described in Attachment B.

JURISDICTION

5. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), &

(c)(1)(A). Specifically, the Court is “a district court of the United States . . . that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

RELEVANT STATUTES

6. Title 18 U.S.C. § 2422(b) makes it federal crime for “[w]hoever, using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall be fined under this title and imprisoned not less than 10 years or for life.” It is also a violation of this statute to attempt to induce a minor through an intermediary who appears to the defendant to exercise some degree of control over that minor, such as a parent or a babysitter. *United States v. Murrell*, 368 F.3d 1283 (11th Cir. 2004).

SUMMARY OF PROBABLE CAUSE

7. The United States, including the FBI, is conducting a criminal investigation of GADMAN regarding a possible violation of 18 U.S.C. § 2422(b) – attempted coercion and enticement.

8. In mid-December 2022, an FBI Online Covert Employee (“OCE”) was operating in an undercover capacity on a foreign fetish website called Fetlife in which the OCE posed as a female adult with several children. The OCE created a group discussion regarding being in an open family in which there were no secrets, a husband, and several children with an interest in meeting similarly interested individuals. The post was made in the New Mexico Personals page. Your Affiant is aware the foreign fetish website is used to meet, discuss, trade images, links, and videos containing child pornography.

9. On approximately January 4, 2023, the OCE received a private message titled, “family” from account with username, “Gadmanj40.” The profile picture was of a white male. Several additional pictures of the same male were uploaded to the profile. In summary, Gadmanj40 indicated he was interested in the OCE’s interests and requested a response. The OCE responded on January 10, 2023, and inquired what part Gadmanj40 was interested in and advised the user that it was a family affair. The OCE advised that the family consisted of three children under 12, a husband, and the OCE; they resided in Albuquerque and would be selective. Gadmanj40 indicated he was interested in the family affair and was open to whatever the OCE wanted. The OCE provided a phone number Gadmanj40 could contact the OCE on.

10. On January 10, 2023, the OCE received a text message from 575-800-9773, and the user advised it was “Gadmanj” from the foreign fetish website. Gadmanj asked the OCE what they wanted and the OCE responded, “I’ll tell you what we have and you tell me what you want. We don’t force anything on nobody. We play as a family not all together. 12 8 n 5 yr olds. Looking for someone with similar interests.” Gadmanj advised he was always into that and it was a turn on. He further advised he was looking for that but did not know what to want because he was new to it and had fantasies about a family affair. The OCE advised she was looking for honesty, trust, if he was willing to pay for it that would be fine but she needed to know he wanted and with who and the children could be prepared so the encounter was smooth for everyone. Gadmanj continued to express interest and eventually indicated he was interested in watching mom/daughter play or sister/brother play. The OCE asked if children turned him on and he advised “of course they do,” and wrote “I could play with your girl.” The OCE advised she had two girls, 12 and 8 years old, and asked if one was better than the other and he wrote, “both.” He further indicated he wanted “them [to] suck me and caress them.” He sent the OCE an additional picture of the same individual

in the Gadmanj40 profile and asked if the OCE would play with him and the girls. Gadmanj advised his name was Joseph and that he lived in Tucumcari, New Mexico, and would be willing to visit the family in Albuquerque on Friday, January 13, 2023, including the minor girls. He continued to inquire about whether the girls were trained and knew how to please. During the conversation, he advised he worked for Door Dash, was a dog sitter, and received a monthly check. He also advised when he was approximately 11-12 years old, he used to try things with a younger cousin who was approximately 10 years old. In response to the OCE questioning if he ever had an opportunity with “younger,” he replied he never had a chance. He further advised he had an opportunity to play with a 15-year-old with her mom’s permission and was going to “pop her cherry,” but things did not work out and he had been wondering about younger. He also indicated he was “one of those that if the parents give the permission then im ok with it, or what ever the kid is comfortable with. But I make sure it’s not a trap. Cause I don’t want anyone in trouble.”

11. On January 11, 2023, he resumed the conversation and he inquired if the children had played with both the OCE and her husband. He inquired about whether the OCE had other people with the children and was told someone else was involved and they treated the family good but had moved and “if you wanted to you could too but no pressure. Whatever you want.” He replied, “like pay for it.” Below is an excerpt of the conversation:

GADMAN	I definitely can't afford help but I'm a nice lay back sweet guy. Just trying to get to know you more. I like to know more what y'all do as a family at home so I will know and it's makes me more comfortable either way I'm still interested.
OCE	What can u do
GADMAN	I can bring snacks like KitKats if they want anything like that

OCE	Ok I'll ask them if they want anything else. Is that ok ?
GADMAN	Anything you need
OCE	Like what
GADMAN	I don't know you said, last person treat all well. So is there anything you need
OCE	What would you be willing to do
GADMAN	Give me some ideas.
OCE	Um I don't know
GADMAN	Ok
OCE	What do you think
GADMAN	I don't know either So tell me about you and your family. What y'all like to do and into. What experience does your oldest one has. I know you like watching does that get you off watching or turn you on. We need to communicate if this is going to be a thing
OCE	Think about it and I will too
GADMAN	I can give you at least maybe 60 I come. Just to help you out

12. GADMAN and the OCE continued to discuss the OCE's purported family and

GADMAN indicated, "so I know you want me to wear a condom what if the oldest wants to do more then put her mouth it like ride it.."

13. A query of law enforcement databases showed the phone number 575-800-9773 is associated with GADMAN, YOB 1982, a 40 year old male. Furthermore, a query of the New Mexico Motor Vehicle Division records showed GADMAN had a driver's license issued in New Mexico and the address listed was in Tucumcari, New Mexico. Your Affiant has viewed

GADMAN's driver's license photo and the photos sent by the 575-800-9773 and believes the individual in all of those photos is GADMAN. GADMAN has a conviction for commercial sex-prostitution in Alabama. A review of GADMAN's Facebook profile showed he listed Door Dash on his profile and Pet Sitter for Joe's Dog Sitting & House Sitting in Facebook introduction. On his Facebook profile, he also listed himself as an owner/blogger of KMAL 4.5 The Station That is Cater To The Bride of Christ" and is an administrator of "Tucumcari, Quay County/Local Church Announcements & Community Events." A review of GADMAN's Instagram account, "jwgadman," showed a hyperlink in which "gadmanj40" was associated with the profile on another website. Your Affiant believes the individual in the Facebook and Instagram profile photos associated with GADMAN is the same individual in the photos sent via text message.

14. On January 12, 2023, United States Magistrate Judge John F. Robbenhaar authorized a federal search warrant for the GADMAN's cell phone to receive location information (23-MR-82). The FBI began to receive cell site information on the device on January 13, 2023. On the same date, GADMAN advised he thought he would arrive for the meeting at a pre-determined location in Albuquerque between 4 and 5pm. The OCE asked for him to let her know if he was going to change his mind and he wrote, "DO you want me to change my mind is this like a trap to have me in trouble or do you really want me to come." GADMAN agreed to provide latex free condoms and sent the OCE a picture of a package on non-latex condoms that he already had. GADMAN then asked if the OCE was going to play and indicated he knew the OCE was watching, and clarified, "what I meant is do want to be involved tomorrow other then watching."

15. On January 13, 2023, GADMAN told the OCE he was going to be headed to visit her and would leave his house between 1-2pm. GADMAN inquired if the OCE had told the daughters he was going to visit and confirmed he had the items he previously agreed on providing.

GADMAN maintained contact with the OCE during the drive and advised he would tell the OCE when he arrived. The FBI observed GADMAN's cellular telephone travel from Tucumcari, New Mexico westbound on I-40 and to a previously provided location in Albuquerque, New Mexico.

16. On January 13, 2023, FBI personnel observed GADMAN arrive at the predetermined location in a Grey Toyota Tacoma. GADMAN parked and attempted to enter the establishment. FBI personnel interdicted GADMAN and detained him pending an investigation. GADMAN was advised of his *Miranda* rights, waived those rights and agreed to speak with investigators. GADMAN indicated he had \$60 in his pocket, and the KitKat bars and condoms (which were the items he agreed to bring for the minors) were in his truck. GADMAN stated this was the first time he had done something like this and mentioned having an opportunity to have sex with a 15-year-old female approximately two years ago but her mom became crazy and he was unable to. GADMAN admitted to being the sole user of the Fetlife account, "gadmanj40," and admitted to being the sole user of his cell phone. Your Affiant confirmed the FBI seized the correct cell phone by calling the phone number the messages had been sent from. The phone seized from GADMAN's pocket rang when your Affiant called it and the contact that showed up was the purported name of the OCE. GADMAN stated he was going to go inside the establishment, go to the bathroom, and leave. GADMAN stated he was interested in engaging in sexual activity with the OCE and claimed the OCE was pushing her daughters onto him. GADMAN was charged with violating 18 U.S.C. § 2422(b), Attempted Coercion and Enticement via criminal complaint (23-MJ-81). On January 19, 2023, United States Magistrate Judge Karen B. Molzen remanded GADMAN into custody pending trial.

17. On January 13, 2023, the FBI obtained search warrants for GADMAN's cell phone (23-MR-107) and truck (23-MR-109). During a search of the truck, three Halloween sized bags of

Kit Kats and a box of non-latex condoms were located. A receipt for the purchase of the Kit Kats was dated January 13, 2023. A receipt for the purchase of the condoms was from December 2022. Sixty dollars were located in GADMAN's wallet. A review of GADMAN's cell phone showed GADMAN informed his father and aunt he was going to Albuquerque on January 13, 2023.

18. The FBI contacted D.B., a former girlfriend of GADMAN's, regarding the alleged opportunity for him to engage in sex with a 15-year-old female. D.B. indicated GADMAN told her about an opportunity to have sex with a 15-year-old but she did not believe him and thought someone was pretending to be that age. She denied being involved in the situation.

19. On February 7, 2023, GADMAN was indicted in the District of New Mexico (23-CR-146), for violating 18 U.S.C. § 2422(b), Attempted Coercion and Enticement.

20. On February 9, 2023, the United States Marshals Service ("USMS") contacted your Affiant regarding GADMAN sending letters to family regarding evidence destruction and his case. GADMAN is incarcerated at the Cibola County Correction Center ("CCCC"). Security Threat Group Officer D. Cole advised your Affiant that CCCC's policy was to review all incoming and outgoing mail for the facility and subsequently provided a copy of the letters to your Affiant. In a letter written by GADMAN to his aunt, B.L., GADMAN indicated he was not guilty but had sent the messages, had changed his mind when he arrived in Albuquerque and advised the FBI of such. He told B.L. his phone and iPad could be erased, and there were Kit Kats, \$60.00, and condoms but advised the condoms had been purchased in December. He also indicated he was going to visit a woman that worked at Lovelace Hospital in Albuquerque and did not know he was soliciting a minor, was mostly playing and texting, and took the bait. He provided B.L. the pin (access code) to his iPad and asked her to cancel online subscriptions and to delete his Fetlife account, username "Gadmanj40." He further advised that account was utilized to communicate with the FBI. In

another letter to his father and mother (“parents,”), GADMAN advised he was not interested in meeting the OCE but there was evidence like Kit Kats, condoms, and \$60.00. He reiterated the condoms were purchased in December. He told his parents he did not plan on providing the OCE anything and had changed his mind about having sex with the purported minors when he arrived at the pre-determined location, was going to the bathroom, and was going to return home. He also advised he would never touch or mess with a kid, was feeding the lady stuff, and did not mean for it to happen.

BACKGROUND CONCERNING FETLIFE¹

21. BitLove Inc. owns and operates a free-access social networking website under the name FetLife that can be accessed at <https://fetlife.com>. FetLife describes itself as a social network similar to Facebook but is tailored specifically to the kinky community. FetLife allows its users to establish accounts with FetLife, and users can use their accounts to communicate with others in various individual or group thread messages. Within each group, users can create specific discussions about a topic of interest so that others can reply to it. A FetLife user can also connect directly with individual FetLife users. Each FetLife user’s account includes information such as Fetishes, Latest Activity, Groups, Relationship Status, Orientation, Is Looking for, Pictures, and About me.

22. FetLife asks users to provide basic contact and personal identifying information to FetLife during the registration process. This information includes Nickname, Gender, Sexual Orientation, Role, Birthday, Location, Email Address, and Password.

¹ The information in this section is based on information published by FetLife on its public website.

23. According to Fetlife's website, FetLife stores and will turn over to law enforcement information for a specific account with a valid search warrant, including signup date, friends only content, email address associated with the account, mobile number associated with the account, IP address(es) used to access the account at a specified time or event relevant to the investigation, any logs which would reveal a user's movements over a period, member or IP-specific analytic data such as browsing history, security access logs other than account creation or for a specific time and date, contents of any private conversation between two or more member, and contents of any private conversation with FetLife, including verification pictures. Social networking providers like FetLife typically retain additional information about their users' accounts, such as the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, FetLife users may communicate directly with FetLife about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like FetLife typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

24. The servers of FetLife are likely to contain the material described above, including stored electronic communications and information concerning subscribers and their use of FetLife, such as account access information, transaction information, and other account information.

25. In my training and experience, evidence of who was using a FetLife account and from where, and evidence related to criminal activity of the kind described above, may be found in the files and records described above. This evidence may establish the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or, alternatively, to exclude the innocent from further suspicion.

26. In addition, the user's account activity, logs, stored electronic communications, and other data retained by FetLife can indicate who has used or controlled the account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, subscriber information, email and messaging logs, documents, and photos and videos (and the data associated with the foregoing, such as geo-location, date, and time) may be evidence of who used or controlled the account at a relevant time. As an example, because every device has unique hardware and software identifiers, and because every device that connects to the Internet must use an IP address, IP address and device identifier information can help to identify which computers or other devices were used to access the account. Such information also allows investigators to understand the geographic and chronological context of access, use, and events relating to the crime under investigation.

27. Account activity may also provide relevant insight into the account owner's state of mind as it relates to the offenses under investigation. For example, information on the account may indicate the owner's motive and intent to commit a crime (*e.g.*, information indicating a plan to commit a crime), or consciousness of guilt (*e.g.*, deleting account information in an effort to conceal evidence from law enforcement).

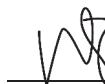
28. Therefore, FetLife's servers are likely to contain stored electronic communications and information concerning subscribers and their use of FetLife services. In my training and experience, such information may constitute evidence of the crimes under investigation including information that can be used to identify the account's user or users.

29. Based upon the information contained in this Affidavit, there is probable cause to believe that FetLife records associated with the Fetlife username "Gadmanj40," account contains evidence of violations of 18 U.S.C. § 2422(b), attempted coercion and enticement of a minor.

CONCLUSION

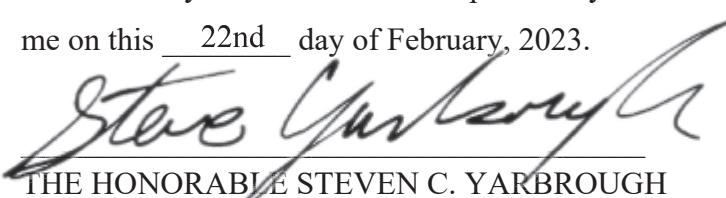
30. Based on the foregoing, I request that the Court issue the proposed search warrant.
31. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.
32. The government will execute this warrant by serving the warrant on BitLove. Because the warrant will be served on BitLove, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.
33. Assistant United States Attorney Jaymie L. Roybal has reviewed and approved this application.

Respectfully submitted,



Nancy Stemo
Special Agent
Federal Bureau of Investigation

Electronically Subscribed and Telephonically SWORN to before
me on this 22nd day of February, 2023.



THE HONORABLE STEVEN C. YARBROUGH
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with FetLife account username “Gadmanj40,” that is stored at premises owned, maintained, controlled, or operated by BitLove, a company headquartered at 718-333 Brooksbank Avenue, Suite #125, North Vancouver, British Columbia.

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by BitLove, Inc. (“BitLove”)

To the extent that the information described in Attachment A is within the possession, custody, or control of BitLove, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to BitLove, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), BitLove is required to disclose the following information to the government for each username listed in Attachment A, for the time period between January 4, 2023 and January 13, 2023:

- (a) All contact and personal identifying information, including full name, user identification number, birth date, gender, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. This includes data that is normally contained in the “About” page of the user profile, including first and last name, birthday, place of work, former or current school, former or current city they are living in, listed family members, any typed in biographical data and “life events.”
- (b) All activity logs for the account and all other documents showing the user’s posts and other FetLife activities from the time the account was created until present;
- (c) All photos and videos uploaded by that username and all photos and videos uploaded by any user that have that user tagged in them from the time the account was created until present, including Exchangeable Image File (“EXIF”) data and any other metadata associated with those photos and videos;

- (d) All profile information; News Feed information; status updates; videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' FetLife user identification numbers or usernames; groups and networks of which the user is a member, including the groups' FetLife group identification numbers and names; future and past event postings; rejected "Friend" requests; blocked "friends;" comments; gifts; pokes; tags; and information about the user's access and use of FetLife applications;
- (e) All records or other information regarding the devices and internet browsers associated with, or used in connection with, that username, including the hardware model, operating system version, unique device identifiers, mobile network information, advertising ID, and user agent string;
- (f) All other records and contents of communications and messages made or received by the user from the time the account was created until present, including all Messenger activity, private messages, chat history, video and voice calling history, and pending "Friend" requests;
- (g) All "check ins" and other location information;
- (h) All IP logs, including all records of the IP addresses that logged into the account;
- (i) All records of the account's usage of the "Like" feature, including all FetLife posts and all non-FetLife webpages and content that the user has "liked;"
- (j) All information about the FetLife pages that the account is or was a "fan" of or followed;
- (k) All past and present lists of friends created by the account, including blocked friends;

- (l) All records of FetLife searches performed by the account from the time the account was created until present;
- (m) The types of service utilized by the user;
- (n) The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- (o) All privacy settings and other account settings, including privacy settings for individual FetLife posts and activities, and all records showing which FetLife users have been blocked by the account;
- (p) Records of any FetLife accounts that are linked to the account by machine cookies (meaning all FetLife user IDs that logged into FetLife by the same machine as the account); and
- (q) All records pertaining to communications between BitLove and any person regarding the user or the user's FetLife account, including contacts with support services and records of actions taken.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. § 2422(b), attempted coercion and enticement involving FetLife username “Gadmanj40,” including, information pertaining to the following matters:

- a. Evidence indicating how and when the FetLife account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the FetLife account owner;
- b. Evidence indicating the FetLife account owner’s state of mind as it relates to the crime under investigation;
- c. The identity of the person(s) who created or used the username, including records that help reveal the whereabouts of such person(s).

This warrant authorizes a review of electronically stored information, communications, other records and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI shall deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.